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**To:** [DH.LTCRegs](#)  
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We are residents of a Continuing Care Retirement Community that has provided high quality care for more than a century. Our Skilled Nursing facility consistently maintains an overall Five-Star rating from the Centers for Medicare and Medicaid Services (CMS).

We are writing to comment on the PA Department of Health's Proposed Nursing Facility Regulations that require nursing homes to increase the requirements for staff from 2.7 Nursing Hours Per Resident Day (NHPRD) to 4.1 NHPRD. Our Skilled Nursing facility has always staffed well above 2.7 NHPRD and believe 4.1 NHPRD is a laudable baseline; however, there are two very significant issues that make such a requirement difficult or impossible to achieve:

- PA has not provided an increase to Medical Assistance Rates for seven (7) years. The gap between what PA pays and the true cost of care has widened significantly in the last seven years making the business model for skilled nursing unsustainable. As a facility that provides high quality of care, the gap between our true cost and what we receive from Medical Assistance is \$200/day/Medical Assistance resident. (The increased costs associated with COVID-19 have made the situation even worse.)
- DOH does not appear to understand or care about the realities of what is likely the worst staffing crisis to ever hit skilled nursing facilities. Despite our implementation of significant wage increases, it remains a struggle to recruit nursing staff.

Thank you for reading this email,  
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